

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

UNITED STATES OF AMERICA

v.

IAN C. PEREZ,

Defendant.

)
) Criminal No. 2:16cr 146
) 18 U.S.C. § 2252(a)(4)(B)
) Possession of Child Pornography
) (Count One)
)
) 18 U.S.C. § 2253
) Criminal Forfeiture
)

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE

On or about the eleventh day of May, 2016, in the Eastern District of Virginia, the defendant, IAN C. PEREZ, did knowingly possess one or more matters containing visual depictions that had been mailed, shipped and transported in interstate and foreign commerce, and which were produced using materials that had been mailed, shipped and transported in interstate and foreign commerce, by any means including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depictions were of such conduct, to wit: IAN C. PEREZ knowingly possessed a Seagate 2TB external hard drive, Model SRD0SD0, Serial Number NA5KF91X, containing visual depictions bearing the file names: "(Pthc) 8 Yo (Preteen) Little Girl Rides Grandpa (Her Grandpa77," "(Japan Lolita) Schoolchild 5 – Kikuko 10Yo (9m40S)," "(opva)(2013) bibigon bb11 – Best of the bibigon girl having sex with dad," and "[Preteen]Color Climax – Teach Your Children Well.8 yo girl, 10 yo boy."

(In violation of Title 18, United States Code, Section 2252(a)(4)(B).)

CRIMINAL FORFEITURE

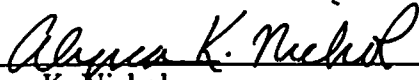
THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

A. Defendant IAN C. PEREZ, upon conviction of the sole count in this Criminal Information, as part of the sentencing of the defendant pursuant to Federal Rule of Criminal Procedure 32.2, shall forfeit to the United States:

1. Any and all matter which contains child pornography produced, transported, mailed, shipped, possessed, or received in violation of Title 18, United States Code, Section 2251 *et seq.*; and
2. Any and all property used or intended to be used in any manner or part to commit or promote the commission of violations of Title 18, United States Code, Section 2251 *et seq.*, and any property traceable to such property.

(In violation of Title 18, United States Code, Section 2253.)

DANA J. BOENTE
UNITED STATES ATTORNEY

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